

EXHIBIT D

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

AT SEATTLE

MICROSOFT CORPORATION, a)
Washington corporation,)
Plaintiff,)
vs.) No. 2-10-cv-
MOTOROLA, INC., and MOTOROLA)
MOBILITY, INC.,)
Defendants.)

VIDEOTAPED 30(b)(6) DEPOSITION OF

May 9, 2013

Job No. CS1663256

Seattle, Washington

Veritext Corporate Services

800-567-8658

973-410-4040

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1 MS. ROBERTS: Andrea Pallios
2 Roberts of Quinn Emanuel, representing defendant
3 Motorola.

4 MS. MANGIN: Elanor Mangin of Quinn
5 Emanuel, representing Motorola.

6 MR. WION: Chris Wion from Calfo
7 Harrigan, representing Microsoft and the witness.

8 THE VIDEOGRAPHER: Thank you.

9 At this time, we'd ask the court reporter, Karmen
10 Knudson of Veritext, to please swear in the witness
11 and proceed with the deposition.

12 JAMES JEFF DAVIDSON, having been first duly sworn
13 by the Notary, deposed and
14 testified as follows:
15
16

17 EXAMINATION

18 BY MS. ROBERTS:

19 Q Good morning, Mr. Davidson.

20 A Good morning.

21 Q As you heard, my name is Andrea Roberts and I'm going
22 to be taking your deposition taken today.

23 Have you ever been deposed before?

24 A Never.

25 Q Okay. Well, I'm going to go over some of the ground

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EXAMINATION (Continuing)

BY MS. ROBERTS:

Q Mr. Davidson, I'd like to kind of get a sense of the timeline of the move from the Düren, Germany facilities to -- to Venray.

So, first of all, when did Microsoft decide to relocate the EMEA facilities?

A It was that first week of March where -- when we decided to do it. But -- somewhere in there. It was early March. Somewhere -- I mentioned March 8th earlier. I know that was an award date.

I think -- it was right within that same time period. It was just a -- a flurry of decisions and activity.

Q And when you say "March," you mean March 2012; right?

A Yes, March of 2012. Sorry.

Q When did Microsoft start considering whether it should move the EMEA facilities?

A Mid-January of 2012.

Q And who -- who ultimately made the decision to move the facilities?

A It would have been me; Owen Roberts, my boss; and his boss, Brian Tobey.

Q Brian Tobey?

A Yes.